

January 17, 2013
Ken Miller
SNAKE RIVER ALLIANCE
Box 1731
Boise, ID 83701
Ph: (208) 344-9161

RECEIVED
2014 JAN 17 PM 3:08
IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	CASE NO. IPC-E-13-22
COMPANY'S APPLICATION TO)	
UPDATE ITS WIND INTEGRATION)	PETITION TO INTERVENE OF
RATES AND CHARGES)	THE SNAKE RIVER ALLIANCE

The Snake River Alliance, pursuant to the Idaho Public Utilities Commission's Rules of Procedure Rule 72 and 73 IDAPA 31.01.01.072 and -.073, petitions the Commission to grant its request for intervention in the above-referenced case, IPC-E-13-22. The name and address of this intervenor is:

Snake River Alliance
Box 1731
Boise, ID 83701
208 344-9161 (o)
208 841-6982 (c)

The Snake River Alliance is represented in this proceeding by Ken Miller. Correspondence in this docket can be sent to the above address or via e-mail to: kmiller@snakeriveralliance.org. To reduce costs and environmental impacts of exchanging information in this case, the Alliance requests that, pursuant to IPUC Rules, information other than that which might be deemed confidential or otherwise must be hand-delivered be provided electronically and/or via email to the above address.

The Snake River Alliance is an Idaho-based non-profit organization, established in 1979 to address Idahoans' concerns about nuclear waste and safety issues. In 2007, the Alliance expanded the scope of its mission by becoming Idaho's first nonprofit clean energy advocacy organization. The Alliance's energy program includes advocacy for renewable energy resources in Idaho; expanded conservation and demand-side management programs offered by Idaho's

regulated electric utilities and the Bonneville Power Administration; and development of local, state, regional, and national initiatives to advance sustainable energy policies, including electric utility rate structures and designs that promote energy conservation. The Alliance pursues these programs on behalf of its members, many of whom are customers of Idaho Power.

The Alliance has participated in proceedings dealing with many of the issues presented in this docket dating back to 2005 (Case No. IPC-E-05-22, Petition for Temporary Suspension of PURPA Contract Obligation for Wind QFs), and also in Case No. IPC-E-07-03 (To Eliminate the 90%/110% Performance Band for Wind-Powered Small Power Production Facilities) and GNR-E-11-01 (In the Matter of the Commission Investigation Into Disaggregation and an Appropriate Published Avoided Cost Rate Eligibility Cap Structure for PURPA Qualifying Facilities).

Many of the issues present in this instant docket are similar in some fashion to some of those issues in the above-referenced cases. The Alliance and those it represents have a direct interest in this case for several reasons. As an advocate of renewable energy generation, the Alliance believes this case will determine in part the ability of Idaho Power and of prospective Idaho wind power developers to integrate new wind resources onto Idaho Power's system. In addition, the Alliance remains very interested in working with Idaho Power, wind developers, and other stakeholders to resolve some of the outstanding integration issues that will be addressed in IPC-E-13-22. The Alliance has reviewed the direct testimony of Michael J. Youngblood and Philip DeVol accompanying Idaho Power's application in this case and believes it can bring a distinct perspective to Idaho Power's most recent wind integration study, which will also be central to processing this docket.

The Alliance believes it and those it represents have direct and substantial interests in the processing and outcome of this case. It also believes that its participation as in intervenor will not complicate or extend this case, nor will its participation unduly broaden the issues in this case, and that to the extent permitted by Commission rules it will actively participate in this case as an intervenor.

Therefore and pursuant to Rules 72 and 73 of the Commission's Rules of Procedure, IDAPA 31.01.01.072 and 073, the Alliance requests that this petition to participate as an intervenor in Case No. IPC-E-13-22 be granted.

Respectfully submitted,



Ken Miller
Clean Energy Program Director
Snake River Alliance
Boise, ID
(208) 344-9161
kmiller@snakeriveralliance.org

Hand Delivered

Jean Jewell
Commission Secretary (Original and seven copies)
Idaho Public Utilities Commission
472 W. Washington St.
Boise, ID 83702

By Electronic Mail

Donovan E. Walker
Lead Counsel
Idaho Power Company
1221 West Idaho Street (83702)
P.O. Box 70
Boise, ID 83707
E-mail: dwalker@idahopower.com

Julia Hilton
Idaho Power Company
1221 West Idaho Street (83702)
P.O. Box 70
Boise, ID 83707
E-mail: jhilton@idahopower.com